

Kavon Adli (Bar No. 203040)
kavon@tilg.us
David Newman (Bar No. 246351)
david@tilg.us
THE INTERNET LAW GROUP
9100 Wilshire Boulevard, Suite 725E
Beverly Hills, CA 90212
tel. (310) 910-1496

Attorneys for Non-party AiPi, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendants.

Case No. 4:22-cv-01490-JST

**NOTICE OF MOTION AND MOTION
TO WITHDRAW AS LOCAL
COUNSEL FOR NON-PARTY AIPI**

Judge: Hon. Jon S. Tigar
Date: June 20, 2024
Time: 2:00 P.M.
Ctrm: 6 – 2nd Floor

PLEASE TAKE NOTICE that on June 20, 2024 at 2:00 pm, or as soon thereafter as may be heard, in the Courtroom of the Honorable Jon S. Tigar, 1301 Clay Street, Oakland, CA 94612, Courtroom 6, Second Floor, local counsel for non-party AiPi, LLC – David Newman and Kavon Adli of The Internet Law Group (“TILG”) – shall and hereby do respectfully seek leave of this Court, pursuant to Local Rule 11-5(a) and (b), to withdraw as counsel for non-party AiPi in this matter.

1 This request comes after the filing of Doc. # 280 on March 29, 2024, to try to correct
2 the docket to indicate that both TILG and AiPi's former lead counsel, Whitestone Law,
3 are no longer counsel of record of record for AiPi. Although the Court disqualified
4 Whitestone as lead counsel, its ruling (Doc. # 279) technically left TILG as local counsel
5 for AiPi. However, TILG has no basis to remain as counsel in any form for AiPi. AiPi is
6 not a party to this action. AiPi does not currently require representation in this matter.
7 TILG has had no direct dealings with AiPi and are unfamiliar with any of the underlying
8 factual allegations. TILG is not prepared to represent AiPi as lead counsel should the need
9 arise. AiPi remains a non-party, AiPi is not subject to personal jurisdiction of the Court,
10 and technically does not need counsel in this matter at this time. Should AiPi become a
11 party and need counsel, there will be sufficient time to find lead counsel. AiPi will not be
12 prejudiced by the formal withdrawal of TILG at this time. TILG respectfully requests that
13 it be permitted to withdraw as local counsel for AiPi, and that the docket reflect that its
14 involvement be terminated. No other counsel in this action has indicated any objection to
15 this withdrawal.

16 For the foregoing reasons, TILG respectfully requests that the Court grant its
17 Motion to withdraw as counsel for non-party AiPi in this action.

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19 DATED: April 16, 2024

THE INTERNET LAW GROUP

20 /s/ David Newman

21 David Newman
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